

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

A.F., ON BEHALF OF J.R.; AND A.R.,  
ON BEHALF OF B.R.,

Plaintiffs,

v.

CHARACTER TECHNOLOGIES, INC.;  
NOAM SHAZEER; DANIEL DE  
FREITAS; GOOGLE, LLC; AND  
ALPHABET INC.

Defendants.

No. 2:24-CV-1014-JRG-RSP

**UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE RESPONSE TO  
MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION (D.I. 33, 38)**

Plaintiffs respectfully file this Unopposed Motion to Extend Plaintiffs' Deadline to File a Response (the "Response") to the Motions to Dismiss (D.I. 33, 38, the "Motions") filed by defendants Noam Shazeer and Daniel De Freitas.

On March 13, 2025, Plaintiffs asked for a two-week extension to respond to the Motions. Defendants agreed to this request on March 14, 2025, making the Response due April 7, 2025 (today). In error, however, Plaintiffs thereafter sought and obtained the Court's consent to a one-week extension only, making the Response due on March 31, 2025 (last Monday).

Due to an internal docketing mistake, Plaintiffs erroneously believed that the Response was due on April 7, 2025 (today), and did not appreciate this error until earlier today. Upon realizing their mistake, counsel for Plaintiffs promptly asked counsel for Messrs. Shazeer and De

Freitas to consent to this motion. Upon hearing Plaintiffs' explanation, counsel indicated that Messrs. Shazeer and De Freitas do not oppose this motion.<sup>1</sup>

Plaintiffs apologize to the Court for their error and respectfully request leave to file the Response after the Court-ordered deadline.

Dated: April 7, 2025

Respectfully submitted,

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<sup>1</sup> Messrs. Shazeer and De Freitas oppose Plaintiffs' cross-motion for jurisdictional discovery, as indicated in the certificate of conference of the Response.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on April 7, 2025 to counsel of record via the Court's ECF System.

/s/ Radu A. Lelutiu  
Radu A. Lelutiu

**CERTIFICATE OF CONFERENCE**

The undersigned reached out to counsel for Noam Shazeer and Daniel De Freitas to request their consent for this motion. Plaintiffs understand that Messrs. Shazeer and De Freitas do not oppose the relief sought herein.

/s/ Radu A. Lelutiu  
Radu A. Lelutiu